

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	
)	
v.)	Criminal No. 05-10010-NMG
)	
)	
IGOR MOYSEYEV et al.,)	
Defendants)	

ASSENTED-TO MOTION FOR ORDER OF EXCLUDABLE DELAY

The United States of America, by and through its undersigned counsel, with the assent of all four defendants, hereby requests that the Court enter an Order of Excludable Delay in this case for the period from October 26, 2005, through January 31, 2006, pursuant to 18 U.S.C. § 3161(h), for the reasons set forth herein.

1. At the status conference on October 25, 2005, defendants requested time to complete their review of documents produced in discovery and determine the need for filing discovery and/or dispositive motions. The Court scheduled a final status conference for December 20, 2005, and the parties agreed to exclude the period from October 26, 2005, through December 20, 2005, from the Speedy Trial Act calculations.

2. At the status conference on December 20, 2005, defendants requested time to complete their review of additional discovery to be made available by the government and to determine the need for filing dispositive motions. The Court set a deadline of January 31, 2006, for the filing of dispositive

motions, and the parties agreed to exclude the period from December 20, 2005, through January 31, 2006, from the Speedy Trial Act calculations.

3. Accordingly, the government now respectfully requests that the Court enter a written Order that the period from October 26, 2005 through January 31, 2006, be excluded from the Speedy Trial Act calculations pursuant to 18 U.S.C. § 3161(h)(8)(A), on the ground that the ends of justice served by allowing the parties sufficient time to produce and review discovery and to consider the need for discovery and dispositive motions outweigh the best interests of the public and the defendant in a speedy trial.

Respectfully submitted,

MICHAEL J. SULLIVAN
United States Attorney

By: /s/ William Weinreb
WILLIAM D. WEINREB
Assistant U.S. Attorney

Dated: December 21, 2005